

1 COLETTE F. STONE, ESQ. (SBN: 129773)  
2 RONALD F. BERESTKA, JR. ESQ. (SBN: 155707)  
3 STONE & ASSOCIATES  
4 A Professional Corporation  
5 2125 Ygnacio Valley Road, Suite 101  
6 Walnut Creek, CA 94598  
7 Telephone: (925) 938-1555  
8 Facsimile: (925) 938-2937  
9 Email: [cstone@stonelawoffice.com](mailto:cstone@stonelawoffice.com)  
10 [rberestka@stonelawoffice.com](mailto:rberestka@stonelawoffice.com)

11 Attorneys for Defendants,  
12 GEORGE M. VLAZAKIS; MARIA BARBIS; JOHN BARBIS;  
13 and ATHANASIA V. VLAZAKIS

14 UNITED STATES BANKRUPTCY COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16 SAN FRANCISCO DIVISION

17 In Re:	)	CASE NO. 19-30088 (DM)
	)	
18 PG&E CORPORATION,	)	Chapter 11
	)	
19 And	)	<b>DECLARATION OF GEORGE M.</b>
	)	<b>VLAZAKIS IN SUPPORT OF</b>
20 PACIFIC GAS AND ELECTRIC COMPANY,	)	<b>OPPOSITION TO DEBTORS'</b>
	)	<b>MOTION TO REJECT CONTRACT</b>
21 Debtors,	)	<b>AND GRANT RELATED RELIEF</b>
	)	
22 <input type="checkbox"/> Affects PG&E Corporation	)	Date: February 11, 2020
23 <input type="checkbox"/> Affects Pacific Gas and Electric Company	)	Time: 10:00 a.m.
24 <input type="checkbox"/> Affects Both Debtors	)	Dept.: 17
	)	450 Golden Gate Ave
	)	San Francisco, CA 94102
25 *All papers shall be filed in the Lead Case, no.	)	Judge: Dennis Montali
26 19-30088 (DM)	)	

27 I, George M. Vlazakis, declare:

28 1. I am a defendant in a lawsuit in the California Superior Court, County of Alameda,  
29 Case number RG19021463 brought by Pacific Gas & Electric Company. I have personal  
30 knowledge of the facts contained in this declaration and if called to testify thereto could  
31 competently do so.

32 2. I am a co-owner of the property located at 225-229 Brush Street and 751 Third  
33 Street in Oakland.

34 3. I am a member of the California State Bar in good standing.

1           4.       I and my two sisters Maria Barbis and Athanasia Vlazakis promptly signed all joint  
2 applications that PG & E's employees and agents presented to us in order to obtain a building  
3 permit to undertake the structural upgrades to the wall that divides the Vlazakis property from the  
4 PG & E property that is involved in this matter.

5           5.       I and the other Vlazakis co-owners performed all of the acts that we were required  
6 to undertake as we agreed to in the November 22, 2017 "Letter Agreement" involved in the  
7 Debtor's motion.

8           6.       Throughout my direct dealings with PG & E through their designated agent, Craig  
9 Communications, PG & E's employees, project manager Brian Garber and prospective bidders for  
10 the structural wall project were given access by myself to the interior of the premises in order to  
11 prepare their bids. I estimate that there were five walk through inspections or more over a period  
12 of several weeks. At no time was access denied to PG & E's employees or prospective bidders for  
13 work pursuant to the contract. In fact, PG & E was provided a key to access an open yard owned  
14 by the Vlazakis to the rear of and adjacent to 751 Third Street to facilitate their work.

15           7.       There is no good reason to deny PG & E and its agents access to the subject  
16 property in order to do the work on the wall since the wall will benefit the Vlazakis, and is  
17 undertaken at PG & E's sole cost and expense. The purpose of the contract was to undertake the  
18 upgrades to the wall on a timely basis which PG & E failed to undertake even before it filed its  
19 most recent bankruptcy in January of 2019.

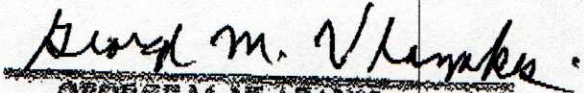
20           8.       In reference to the approval of the second joint application for the building permit  
21 to do the work on the subject wall, neither Brian Garber nor any PG & E agent, ever advised me  
22 that the approved joint building permit application was conditioned on ADA compliance or  
23 seismic upgrades. Brian Garber admits in two of his declarations submitted to the court that the  
24 second joint application for the building permit was submitted to the City of Oakland and  
25 approved.

26           9.       I asked Brian Garber if the City of Oakland was requiring an ADA compliant  
27 bathroom as a condition of approval of the second joint building permit application. Brian  
28 Garber's verbal response to me was "no". At no time did PG & E's employees and/or their agents

1 provide me or the other co-owners any proof that ADA compliances and/or seismic upgrades were  
2 required as a condition of approval of the structural work to be done on the subject wall.

3 I declare under penalty of perjury under the laws of the State of California and the United  
4 States of America, that the foregoing is true and correct.

5 Executed on this 20th day of January, 2020, at Oakland, California.

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8 GEORGE M. VLAZAKIS  
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